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**MEMO ENDORSED**

December 2, 2021

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VIA ECF

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: ***United States v. Michael Rose, 21 Cr 224 (VEC)***

Dear Judge Caproni:

We represent defendant Michael Rose in the above-captioned matter. With the consent of the government, we write to request an adjournment of the December 3, 2021 deadline for Mr. Rose to submit any motions *in limine* to the Court. The parties have been actively engaged in discussions regarding this case and will continue to do so while also preparing for a potential trial in order to avoid any unnecessary delay.

We understand that this matter has been tentatively set for trial to commence on March 28, 2021 and the Court has accordingly scheduled a pre-trial conference for March 24, 2021. Should the Court deem it appropriate, we can confer with the government and jointly propose a new schedule for pre-trial motion practice given these dates or proceed in whatever other manner the Court prefers.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

  
E. Danya Perry

cc: AUSA Samuel Adelsberg (via ECF)

Application GRANTED. The deadline to submit motions *in limine* is hereby ADJOURNED from December 3, 2021 until January 18, 2022. Any responses must be submitted not later than February 2, 2022.

SO ORDERED.

 12/2/21

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE